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**BELLSOUTH**  
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BellSouth  
Suite 900  
1133-21st Street, N.W.  
Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Kathleen B. Levitz  
Vice President-Federal Regulatory

202 463-4113  
Fax 202 463-4198

November 2, 2000

EX PARTE

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554

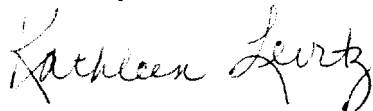
Re: CC Docket No. 96-98

Dear Ms. Salas:

This is to inform you that on November 1, 2000 Jonathan Banks, and I, representing BellSouth, met with Jodie Donovan-May and Tom Navin of the Common Carrier Bureau's Policy and Program Planning Division. The purpose of the meeting was to discuss why the Commission should deny the WorldCom petition for waiver of the Supplemental Order Clarification issued in CC Docket No. 96-98. The attached document formed the basis for our presentation.

We are filing notice of this ex parte meeting in the docket identified above, as required by Commission rule and request that you associate this notice with the record of that proceeding. If you have any questions concerning this, please call me at 202.463.4113

Sincerely,



Kathleen B. Levitz

Attachment

cc: Jodie Donovan-May (w/o attachment)  
Tom Navin (w/o attachment)

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List ABCDE

BellSouth *Ex Parte*  
in  
CC Docket No. 96-98:

November 1, 2000

# Background

- FCC releases its Supplemental Clarification Order on June 2, 2000
- WorldCom files a “Petition for A Waiver” on September 13, 2000 to permit it to convert additional special access circuits to UNEs

# The petition fails to show good cause for its “waiver”

- WorldCom offers no evidence that the circuits it seeks to convert to UNEs carry a significant amount of local **exchange** service
- WorldCom fails to show that its network is unique

- As a petition for reconsideration, WorldCom's filing should be summarily dismissed
  - it is an untimely request for reconsideration of the SCO
  - it raises only arguments considered and explicitly rejected by the FCC
  - it offers no new facts or facts that were not known to WorldCom prior to release of the SCO

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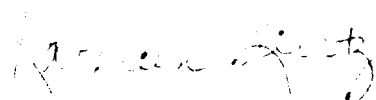
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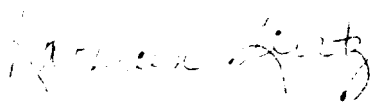
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